

Kent Ries, Attorney at Law  
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COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 AMARILLO DIVISION**

<b>IN RE:</b>	§	
	§	
<b>MICHAEL STEPHEN GALMOR,</b>	§	<b>CASE NO. 18-20209-RLJ-7</b>
	§	
<b>Debtor.</b>	§	
	§	
<b>And</b>	§	
	§	
<b>GALMOR’S/G&amp;G STEAM SERVICE, INC.,</b>	§	<b>CASE NO. 18-20210-RLJ-7</b>
	§	
<b>Debtor.</b>	§	

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<b>KENT RIES, TRUSTEE,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>ADVERSARY NO. 20-2003</b>
	§	
<b>GALMOR FAMILY LIMITED PARTNERSHIP and GALMOR MANAGEMENT, L.L.C.,</b>	§	
	§	
<b>Defendants.</b>	§	

**TRUSTEE’S TRIAL WITNESS AND EXHIBIT LIST**

TO THE HONORABLE BANKRUPTCY JUDGE:

Comes now, Kent Ries, Trustee in the above-entitled case, and files this his Trial Witness and Exhibit List, and respectfully shows the Court as follows:

A. Trustee may call one or more of the following witnesses at the trial:

1. Matt Brooks
2. Michael Stephen Galmor
3. Deena Carter
4. Kellye Fuchs
5. Traci Coleman
6. Rudas Galmor
7. Shawn Zaointz
8. Leslie Pritchard
9. Matthew Merriott and/or Joe Lovell
10. Kent Ries
11. Any Witness identified by the Defendants

B. Trustee may produce one or more of the following exhibits at the trial:

1. Galmor's / G & G Steam Service bankruptcy schedules and declaration on same. (Pleadings #13 and #14 in Case #18-20210)
2. Michael Stephen Galmor bankruptcy schedules (amended). (Pleading #94 in Case #18-20209)
3. Michael Stephen Galmor bankruptcy schedules. (Pleadings #19 in Case #18-20209)
4. Plaintiff's Original Complaint in Adversary #18-2010 filed by Leslie Pritchard, et. al.
5. Exhibits 1 through 8 to Plaintiff's Original Complaint in Adversary #18-2010.
  - (1) The Bobby and Shirley Galmor Living Trust (including three amendments).
  - (2) Certificate of Merger between Galmors, Inc. and G & G Steam Service, Inc.

- (3) Order Admitting Will and Codicil as Muniment of Title in Bobby Galmor probate (including will).
  - (4) Galmor Family Limited Partnership formation documents.
  - (5) Galmor Management, LLC. formation documents and Agreement.
  - (6) Galmor Family Limited Partnership Agreement.
  - (7) Deeds and Bills of Sale from Bobby and Shirley Galmor to Galmor Family Limited Partnership.
  - (8) Assignment of Galmor Family Limited Partnership interests to The Galmor Family Trust and The Galmor Contribution Trust.
- 6. Settlement Agreement between G & G Steam Service, Inc., Galmor's Inc., Bobby D. Galmor, Shirley J. Galmor, Michael S. Galmor and Randy M. Galmor dated January 20, 2001.
  - 7. Amendment and Ratification of Compromise and Settlement Agreement between Michael Stephen Galmor, Leslie Pritchard and Traci Coleman in Adversary #19-2006 dated August 7, 2019, and Amendment and Ratification of same.
  - 8. Galmor Family Limited Partnership tax return for 2013.
  - 9. Galmor Family Limited Partnership tax return for 2014.
  - 10. Galmor Family Limited Partnership tax return for 2015.
  - 11. Galmor Family Limited Partnership tax return for 2016.
  - 12. Galmor Family Limited Partnership tax return for 2017.
  - 13. G & G Steam Service tax return for 2016.
  - 14. G & G Steam Service tax return for 2017.
  - 15. Galmor Family Trust tax return for 2013.
  - 16. Galmor Family Trust tax return for 2014.
  - 17. Galmor Family Trust tax return for 2015.
  - 18. Galmor Family Trust tax return for 2016.

19. Galmor Family Trust tax return for 2017.
20. Galmor Contribution Trust tax return from 2017.
200. Royalty advances spreadsheet.
201. Royalty advances check copies.
202. G & G Steam Service bank statement dated May 29, 2015.
203. G & G Steam Service bank statement dated July 31, 2015.
204. G & G Steam Service bank statement dated August 31, 2015.
205. G & G Steam Service bank statement dated September 30, 2015.
206. G & G Steam Service bank statement dated October 30, 2015.
207. G & G Steam Service bank statement dated November 30, 2015.
208. G & G Steam Service bank statement dated December 31, 2015.
209. G & G Steam Service bank statement dated January 29, 2016.
210. G & G Steam Service bank statement dated February 29, 2016.
209. G & G Steam Service bank statement dated March 31, 2016.
211. G & G Steam Service bank statement dated April 29, 2016.
212. G & G Steam Service bank statement dated May 31, 2016
213. G & G Steam Service bank statement dated June 30, 2016
214. G & G Steam Service bank statement dated July 29, 2016.
215. Galmors Inc bank statement dated July 29, 2016.
216. G & G Steam Service bank statement dated August 31, 2016.
217. G & G Steam Service bank statement dated October 31, 2016.
218. Galmor Inc bank statement dated October 31, 2016.
219. Galmor Inc bank statement dated November 30, 2016.

- 220. Galmor Inc bank statement dated December 30, 2016.
- 221. G & G Steam Service bank statement dated December 31, 2016.
- 222. G & G Steam Service bank statement dated January 31, 2017.
- 223. G & G Steam Service bank statement date February 28, 2017.
- 224. Galmor Inc bank statement dated March 31, 2017.
- 225. Galmor Inc bank statement dated April, 2017.
  
- 250. GFLP bank statement dated May 29, 2015.
- 251. GFLP bank statement dated July 31, 2015.
- 252. GFLP bank statement dated August 31, 2015.
- 253. GFLP bank statement dated September 30, 2015.
- 254. GFLP bank statement dated October 30, 2015.
- 255. GFLP bank statement dated November 30, 2015.
- 256. GFLP bank statement dated December 31, 2015.
- 257. GFLP bank statement dated January 29, 2016.
- 258. GFLP bank statement dated February 29, 2016.
- 259. GFLP bank statement dated March 31, 2016.
- 260. GFLP bank statement dated April 29, 2016.
- 261. GFLP bank statement dated May 31, 2016.
- 262. GFLP bank statement dated June 30, 2016.
- 263. GFLP bank statement dated July 29, 2016.
- 264. GFLP bank statement dated August 31, 2016.
- 265. GFLP bank statement dated October 31, 2016.

- 266. GFLP bank statement dated November 30, 2016.
- 267. GFLP bank statement dated December 30, 2016.
- 268. GFLP bank statement dated January 31, 2017.
- 269. GFLP bank statement dated February 28, 2017.
- 270. GFLP bank statement dated March 31, 2017.
- 271. GFLP bank statement dated April 28, 2017.
  
- 300. QuickBooks invoice report.
- 301. Galmor's / G & G Steam Service Invoice #120423 to the GFLP dated June 30, 2014 in the amount of \$44,064.35.
- 302. Galmor's / G & G Steam Service Invoice #121090 to the GFLP dated July 25, 2014 in the amount of \$80,880.16.
- 303. Galmor's / G & G Steam Service Invoice #121125 to the GFLP dated July 31, 2014 in the amount of \$5,251.57.
- 304. Galmor's / G & G Steam Service Invoice #121118 to the GFLP dated August 11, 2014 in the amount of \$1,950.00.
- 305. Galmor's / G & G Steam Service Invoice #121693 to the GFLP dated August 29, 2014 in the amount of \$842.03.
- 306. Galmor's / G & G Steam Service Invoice #121994 to the GFLP dated August 31, 2014 in the amount of \$6,691.41.
- 307. Galmor's / G & G Steam Service Invoice #122454 to the GFLP dated September 30, 2014 in the amount of \$6,372.43.
- 308. Galmor's / G & G Steam Service Invoice #123004 to the GFLP dated October 31, 2014 in the amount of \$7,161.89.
- 309. Galmor's / G & G Steam Service Invoice #123558 to the GFLP dated November 30, 2014 in the amount of \$13,522.47.
- 310. Galmor's / G & G Steam Service Invoice #123993 to the GFLP dated December 31, 2014 in the amount of \$11,976.04.

- 311. Galmor's / G & G Steam Service Invoice #124565 to the GFLP dated January 31, 2015 in the amount of \$10,869.22.
- 312. Galmor's / G & G Steam Service Invoice #126112 to the GFLP dated October 31, 2015 in the amount of \$107,636.27.
- 313. Galmor's / G & G Steam Service Invoice #127966 to the GFLP dated September 30, 2016 in the amount of \$72,540.90.
- 314. Galmor's / G & G Steam Service Invoice #128668 to the GFLP dated December 31, 2016 in the amount of \$10,263.00.
- 315. Galmor's / G & G Steam Service Invoice #129278 to the GFLP dated March 31, 2017 in the amount of \$4,881.00.
  
- 400. 2014 Dodge Van, Texas Certificate of Title,
- 401. Steve Galmor check stub #6530, dated May 19, 2017.
- 402. Steve Galmor bank statement dated June 6, 2017.
  
- 500. First Amended Complaint in Adversary #20-2003. (Document #10)
- 501. Answer and Counterclaim in Adversary #20-2003. (Document #18)
- 502. Reply to Counterclaim in Adversary #20-2003. (Document #22)
- 503. Defendant's discovery answers in Adversary #20-2003.
- 504. Complaint in Adversary #19-2006. (Document #1)
- 505. Agreed Judgement in Adversary #19-2006. (Document #26)
- 506. Objection to Claim 32 in bankruptcy case #18-20210. (Document #169)
- 507. Order on Objection to Claim 32 in bankruptcy case #18-20210. (Document #172)
- 508. Objection to Claim 15 in bankruptcy case #18-20209. (Document #189)
- 509. Agreed Order on Objection to Claim 15 in bankruptcy case #18-20209. (Document #201)

- 600. Deena Carter email and notes dated February 1, 2019.
- 601. Deena Carter fax and notes dated May 4, 2011.
- 602. Warranty Deed from Bobby and Shirley Galmor to their Living Trust dated July 20, 2005.
- 603. Multiple text messages with Leslie Pritchard.
- 700. Any exhibits identified by Defendant's.
- 701. Any pleadings in Adversary Proceedings #20-2003 and #19-2006.

C. The estimated time of trial is two days.

Respectfully Submitted,

Kent Ries, Attorney at Law  
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(806) 242-7440-Fax

By: /s/ Kent Ries  
Kent Ries  
State Bar No. 16914050

COUNSEL FOR TRUSTEE



**CERTIFICATE OF SERVICE**

I certify that on this 27<sup>th</sup> day of January, 2022, a true and correct copy of the foregoing document was sent electronically to the following party:

Davor Rukavina  
Munsch, Hardt, Kopf & Harr  
500 N. Akard Street, Suite 3800  
Dallas, Texas 75201-6659

/s/ Kent Ries  
Kent Ries